AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

___ DISTRICT OF ___ MASSACHUSETTS

UNITED STATES OF AMERICA

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JULIO CARRION SANTIAGO, PEDRO ALBERTO MIRANDA, REYNALDO RIVERA, JOSE RODRIGUEZ, ENRIQUE AGOSTO, JOSE TORRADO, CARLOS SANCHEZ, LUIS R. SANCHEZ, EDWIN TORREZ, ZULEIMA REYES and SANTIAGO ARROYO

CRIMINAL COMPLAINT

CASE NUMBER: 2004 M 0500 RBC

knowledge and belief.		t December 2003 and corout October 2004	ntinuing	in MIDDLESE	X AND WORCESTE	R county, in the
	District o	MASSACHUSETTS	defend	ant(s) did, (Track	Statutory Language of O	ffense)
CONSPIRE TO POSS A DETECTABLE AMO	ESS WITH II UNT OF HE	NTENT TO DISTRIBUTE AN ROIN, A SCHEDULE 1 CON	ID DISTRIBU ITROLLED S	ITE A MIXTURE UBSTANCE	OR SUBSTANCE	CONTAINING
n violation of Title	21	_ United States Code, Sect	tion(s)	8	46, 841(a)(1)	
further state that	am a(n)	SPECIAL AGENT, [DEA	and that this	complaint is based	on the followin
indicate that is		Official Title				
facts:						
SEE ATTACHED AFF	DAVIT OF S	PECIAL AGENT CALICE CO	OUCHMAN			
•						
Continued on the at	tached she	et and made a part here	enf.	⊠ Yes	No	
Continued on the at	tached 3110	et and made a part note				
				Signat	ure of Complainant	^
				- •	ent Calice Coucl	·
Sworn to before me	and subscr	ibed in my presence,		phecial Whe	ant Cance Couci	.mian
	+ 6:1	Jbm		POSTON	MASSACHUSETTS	2
10-14-2004		Jpm at			City and State	
Date		U				
ROBERT B. COLLING UNITED STATES MAG		UDGE		Nm		
UNITED STATES MA	JIO I TOATE J	ODGL	9/0		re of Judicial Officer	

Criminal Case Cover Sheet	U.S. District Court - District of Massachusetts
Place of Offense: C	Category No. I Investigating Agency DEA
City	Related Case Information: Superseding Ind./ Inf. Case No. Same Defendant New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of
Defendant Information:	
Defendant Name <u>JULIO CARRION SAN</u>	TIAGO Juvenile Yes X No
Alias Name MACHO	
Address 264 MECHANIC ST., 2 ND FL.,	LEOMINISTER, MA
Birth date (Year only): 1959 SSN (last 4	4 #): Sex Race: Nationality:
Defense Counsel if known:	Address:
Bar Number:	
U.S. Attorney Information:	
AUSA DENISE JEFFERSON CASPER	Bar Number if applicable
Interpreter: X Yes No	List language and/or dialect: SPANISH
Matter to be SEALED: X Yes	No No
XWarrant Requested	Regular Process In Custody
Location Status:	
Arrest Date:	
Already in Federal Custody as Already in State Custody On Pretrial Release: Ordered by	
Charging Document: Compla	aint Information Indictment
Total # of Counts: Petty	Misdemeanor Felony
Contin	ue on Page 2 for Entry of U.S.C. Citations
accurately set forth above.	signature of AUSA China Company
Date: OCTOBER 14, 2004 S	agnature of AUSAN THE OF THE O

District Court Cose N					
	District Court Case Number (To be filled in by deputy clerk): Name of Defendant JULIO CARRION SANTIAGO				
U.S.C. Citations					
Index Key	y/Code	Description of Offense Charged	Count Numbers		
Set 1 21 USC § 846		Conspiracy to distribute heroin			
Set 2					
Set 3					
Set 4		· · · · · · · · · · · · · · · · · · ·			
Set 5		•			
Set 6					
Set 7					
Set 8					
Set 9					
Set 10					
Set 11					
Set 12					
Set 13					
Set 14					
Set 15					

Criminal Case Cover Sheet	<u>U.S</u>	S. District Court - District of Massachusetts
Place of Offense:	Category No. <u>I</u>	Investigating Agency <u>DEA</u>
City	Related Case Information:	1
County MIDDLESEX/WORCESTER	Magistrate Judge Case Numb Search Warrant Case Numbe	Case No. DYM 500 New Defendant
Defendant Information:		
Defendant Name PEDRO ALBERTO N	<u>MIRANDA</u>	Juvenile Yes X No
Alias Name TAVO		
Address 212 WILDER ST., LOWELL,	MA	
Birth date (Year only): 1969 SSN (last	t 4 #): Sex Race:	Nationality:
Defense Counsel if known:	Ac	ldress:
Bar Number:		
U.S. Attorney Information:		
AUSA DENISE CASPER	Bar Numb	per if applicable
Interpreter: X Yes No	List language and/or	r dialect: SPANISH
Matter to be SEALED: X Yes	□ No	
Warrant Requested	Regular Process	☐ In Custody
Location Status:		·
Arrest Date:		
Already in Federal Custody as		in
Already in State Custody On Pretrial Release: Ordered by	Serving	
Charging Document: X Comp	laint Information	n Indictment
Total # of Counts: Petty	Misdemean	or X Felony 1
Conti	inue on Page 2 for Entry of U.S	S.C. Citations
accurately set forth above.	umbers of any prior proceedin	gs before a Magistrate Judge are

-		<u>O MA 3/25/02) Page</u> umber <i>(</i> To he t	filled in by deputy clerk):	
		•	BERTO MIRANDA	
·			U.S.C. Citations	
	Index Key	y/Code	Description of Offense Charged	Count Numbers
Set 1 _2	21 USC § 846		Conspiracy to distribute heroin	
Set 2 _				
Set 3 _				
Set 4 _				
Set 5 _	,,			
Set 6				
Set 7 _				
Set 8 _				
Set 9 _				
Set 10 _				
Set 12 _				
Set 13 _				

Criminal Case Cover Sheet	U.S. District Court - District of Massachusetts
Place of Offense: C	ategory No. I Investigating Agency DEA
City	Related Case Information:
County MIDDLESEX/WORCESTER	Superseding Ind./ Inf. Case No. Same Defendant New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of
Defendant Information:	
Defendant Name <u>REYNALDO RIVERA</u>	Juvenile Yes X No
Alias Name REY	
Address 235 18 TH ST., APT 204 DRACU	T, MA
Birth date (Year only): 1978 SSN (last 4	#): Sex Race: Nationality:
Defense Counsel if known:	Address:
Bar Number:	
U.S. Attorney Information:	
AUSA DENISE CASPER	Bar Number if applicable
Interpreter: X Yes No	List language and/or dialect: SPANISH
Matter to be SEALED: X Yes	□ No
X Warrant Requested	Regular Process In Custody
Location Status:	•
Arrest Date:	
Already in Federal Custody as	in
Already in State Custody On Pretrial Release: Ordered by	
On Pretrial Release: Ordered by Charging Document:	
	Misdemeanor X Felony 1
Total # of Counts: Petty	
	ue on Page 2 for Entry of U.S.C. Citations
I hereby certify that the case nur accurately set forth above.	mbers of any prior proceedings before a Magistrate Judge are
Date: OCTOBER 14, 2004 S	ignature of AUSA:
	_

S JS 45	(5/97) - (Revised USA	O MA 3/25/02) Page	2 of 2 or Reverse	
Name	of Defendant	REYNALDO		
			U.S.C. Citations	
	<u>Index Ke</u>	<u>y/Code</u>	Description of Offense Charged	Count Numbers
Set 1	21 USC 846		Conspiracy to distribute heroin	
Set 2				
Set 3			·	
Set 4				
Set 5				
Set 6				
Set 7				
Set 8				
Set 9				
Set 10			·	
Set 11				
Set 12				
Set 13				

Criminal Case Cover Sheet	U.S	5. District Court - District of Massachusetts
Place of Offense: C	Category No. I	Investigating Agency DEA
City	Superseding Ind./ Inf. Same Defendant Magistrate Judge Case Number Search Warrant Case Number	Case No. OY-MI-500 New Defendant (04)
Defendant Information:		
Defendant Name <u>JOSE RODRIGUEZ</u>		Juvenile Yes X No
Alias Name		
Address 261 AILEEN ST 2 ND FL. LOW	ELL, MA	
Birth date (Year only): 1962 SSN (last	4 #): Sex Race:	Nationality:
Defense Counsel if known:	Ad	dress:
Bar Number:		
U.S. Attorney Information:		
AUSA DENISE JEFFERSON CASPER	Bar Numb	er if applicable
Interpreter: X Yes No	List language and/or	dialect: SPANISH
Matter to be SEALED: X Yes	☐ No	
Warrant Requested	Regular Process	☐ In Custody
Location Status:		
Arrest Date:		
Already in Federal Custody as Already in State Custody On Pretrial Release: Ordered by		
Charging Document: X Comple	aint Information	Indictment
Total # of Counts: Petty	Misdemean	or X Felony 1
Contin	ue on Page 2 for Entry of U.S	.C. Citations
I hereby certify that the case nu accurately set forth above.	mbers of any prior proceeding	gs before a Magistrate Judge are
Date: OCTOBER 14, 2004	Signature of AUSA:	nix () (ogon

233 43 (3/3/) - (Revised USA	O NEA 3/23/02) 1 age	2 01 2 01 Reverse			
District Court Case No	umber (To be f	illed in by deputy clerk):			
Name of Defendant JOSE RODRIGUEZ					
U.S.C. Citations					
Index Key	<u>v/Code</u>	Description of Offense Charged	Count Numbers		
Set 1 21 USC § 846		Conspiracy to distribute heroin			
Set 2					
Set 3					
Sat 4					
Set 5		·			
	_				
Set 6					
Set 7					
Cat 0			•		
Set 6					
Set 9					
Set 10					
Set 11					
Sot 12		<u> </u>			
Set 12					
Set 13					
Set 14					
Set 15					

Case 1:04-cr-10336-NMG Document 1

Filed 10/14/2004

Page 10 of 23

Criminal Case Cover Sheet	U.S	. District Court - District of Massachusetts
Place of Offense: C	Category No. I	Investigating Agency DEA
County MIDDLESEX/WORCESTER	Superseding Ind./ Inf. Same Defendant Magistrate Judge Case Number Search Warrant Case Number	Case No. DYM 500 New Defendant (05)
Defendant Information:		
Defendant Name ENRIQUE AGOSTO	•	Juvenile Yes X No
Alias Name		
Address 1 SHATTUCK ST APT 303, LO	OWELL, MA	
Birth date (Year only): 1964 SSN (last	4 #): Sex Race:	Nationality:
Defense Counsel if known:	Ad	dress:
Bar Number:		
U.S. Attorney Information:		
AUSA DENISE CASPER	Bar Numb	er if applicable
Interpreter: X Yes No	List language and/or	dialect: SPANISH
Matter to be SEALED: X Yes	☐ No	
XWarrant Requested	Regular Process	☐ In Custody
Location Status:		
Arrest Date:		
Already in Federal Custody as Already in State Custody On Pretrial Release: Ordered by	Serving	in Sentence Awaiting Trial on
Charging Document: X Comple	aint Information	Indictment
Total # of Counts: Petty	Misdemean	or X Felony 1
Contin	nue on Page 2 for Entry of U.S	.C. Citations
I hereby certify that the case nu accurately set forth above.	mbers of any prior proceeding	gs before a Magistrate Judge are
Date: OCTOBER 14, 2004	Signature of AUSA:	rise U. Copy

SJS 45 (5/9	7) - (Revised USAO MA 3/25/02) Pa	ge 2 of 2 or Reverse		
District (Court Case Number (To be	e filled in by deputy clerk):		
	Defendant ENRIQUE			
		U.S.C. Citations		
	Index Key/Code	Description of Offense Charged	Count Numbers	
Set 1	21 U.S.C. § 846	CONSPIRACY TO DISTRIBUTE HEROIN		
Set 2				
Set 10				
Set 11				
Set 12 _				
Set 13				
Set 14				
Set 15				

Criminal Case Cover Sheet	U.S	. District Court - District of Massachuse	etts
Place of Offense: C	ategory No. I	Investigating Agency <u>DEA</u>	
County MIDDLESEX/WORCESTER	Superseding Ind./ Inf. Same Defendant Magistrate Judge Case Number Search Warrant Case Number	Case No. 04MJ 500 New Defendant	<u>_</u> ` 16)
Defendant Information:			
Defendant Name JOSE TORRADO		Juvenile Yes X No	
Alias Name			
Address 241 MOODY STREET, LOWE	LL, MA		
Birth date (Year only): 1980 SSN (last 4	4 #): Sex Race: .	Nationality:	
Defense Counsel if known:	Ad	dress:	
Bar Number:			
U.S. Attorney Information:			
AUSA DENISE JEFFERSON CASPER	Bar Numb	er if applicable	
Interpreter: X Yes No	List language and/or	dialect: SPANISH	
Matter to be SEALED: X Yes	No		
XWarrant Requested	Regular Process	☐ In Custody	
Location Status:			
Arrest Date:			
Already in Federal Custody as Already in State Custody On Pretrial Release: Ordered by			- ·
Charging Document: X Compla	aint Information	Indictment	
Total # of Counts: Petty	Misdemean	or X Felony 1	
Contin	ue on Page 2 for Entry of U.S	.C. Citations	
I hereby certify that the case number accurately set forth above. Date: OCTOBER 14, 2004	mbers of any prior proceeding	gs before a Magistrate Judge are	

S JS 45	(5/97) - (Revised USA	O MA 3/25/02) Page 2	2 of 2 or Reverse	
Distri	ct Court Case N	umber (To be fi	lled in by deputy clerk):	
		JOSE TORRA		
			U.S.C. Citations	
	Index Ke	y/Code	Description of Offense Charged	Count Numbers
Set 1	21 USC § 846		Conspiracy to distribute heroin	
Set 2				
Set 3				
Set 4				
Set 5				
Set 6				
Set 7				
Set 8			·	
Set 9				
Set 10	•			
Set 11				
Set 12				
Set 13				
Set 14				
Set 15		 		

Criminal Case Cover Sheet	<u>U.S</u>	. District Court - District of Massachusetts		
Place of Offense:	Category No. <u>I</u>	Investigating Agency DEA		
City	Related Case Information:			
County MIDDLESEX/WORCESTER	Superseding Ind./ Inf. Same Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of	Case No. O4mJ600 New Defendant (07)		
Defendant Information:				
Defendant Name CARLOS SANCHEZ		Juvenile Yes X No		
Alias Name CARLITOS				
Address 270 FAIRMOUNT ST APT 1	F, FITCHBURG, MA			
Birth date (Year only): 1982 SSN (last	4 #): Sex Race:	Nationality:		
Defense Counsel if known:	Ad	dress:		
Bar Number:				
U.S. Attorney Information:				
AUSA DENISE JEFFERSON CASPER	Bar Numbe	er if applicable		
Interpreter: X Yes No	List language and/or	dialect: SPANISH		
Matter to be SEALED: X Yes	No No			
XWarrant Requested	Regular Process	☐ In Custody		
Location Status:				
Arrest Date:				
Already in Federal Custody as	Already in Federal Custody as in			
Already in State Custody Serving Sentence Awaiting Trial On Pretrial Release: Ordered by on				
Charging Document: X Compl	aint Information	Indictment		
Total # of Counts: Petty	Misdemeand	or X Felony 1		
Conti	nue on Page 2 for Entry of U.S.	.C. Citations		
accurately set forth above.	imbers of any prior proceeding	gs before a Magistrate Judge are		
Date OCIODER 17, 2007	orginature of AUDA.			

■JS 45	(5/97) - (Revised USA	O MA 3/25/02) Page 2	2 of 2 or Reverse	
Distri	et Court Case N	umber (To be fi	illed in by deputy clerk):	
Name	of Defendant	CARLOS SA	NCHEZ	
			U.S.C. Citations	
	Index Ke	<u>y/Code</u>	Description of Offense Charged	Count Numbers
Set 1	21 USC § 846		Conspiracy to distribute heroin	
Set 2				
Set 3				
Set 4				
Set 5				·
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Set 11		· · ·		
Set 12				
Set 13				
Set 14				
Set 15				MA TO

Criminal Case Cover Sheet	U.S	. District Court - District of Massachusetts
Place of Offense: C	ategory No. <u>I</u>	Investigating Agency DEA
City	Related Case Information:	NS
County MIDDLESEX/WORCESTER	Magistrate Judge Case Number Search Warrant Case Number	Case No. U4-500 New Defendant (08)
Defendant Information:		
Defendant Name <u>LUIS R. SANCHEZ</u>		Juvenile Yes X No
Alias Name PITO		
Address 427 ROSEWOOD LANE, LOW	ELL, MA	·
Birth date (Year only): 1974 SSN (last 4	#): Sex Race: _	Nationality:
Defense Counsel if known:	Ado	dress:
Bar Number:		
U.S. Attorney Information:		
AUSA DENISE JEFFERSON CASPER	Bar Numbe	er if applicable
Interpreter: X Yes No	List language and/or	dialect: SPANISH
Matter to be SEALED: X Yes	No	
Warrant Requested	Regular Process	In Custody
Location Status:		
Arrest Date:		
Already in Federal Custody as Already in State Custody On Pretrial Release: Ordered by	Serving S	
Charging Document: Compla		
Total # of Counts: Petty	Misdemeano	or Felony
Contin	ue on Page 2 for Entry of U.S.	.C. Citations
I hereby certify that the case nuraccurately set forth above. Date: OCTOBER 14, 2004 S	mbers of any prior proceeding	gs before a Magistrate Judge are

33 43 (3/37) - (Reviseu USA				
	-	lled in by deputy clerk):		
Name of Defendant	LUIS R. SAN	CHEZ		
		U.S.C. Citations		•
Index Key	y/Code	Description of Offense	<u>Charged</u>	Count Numbers
Set 1 21 USC § 846		Conspiracy to distribute heroin		
Set 2			-	
Set 3				
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Set 4				
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Set 12				
Set 13				
Set 14				
Set 15			•	
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Criminal Case Cover Sheet	U.S. District Court - District of Massachusetts
Place of Offense: C	ategory NoI Investigating Agency _DEA
City	Related Case Information:
County MIDDLESEX/WORCESTER	Superseding Ind./ Inf. Case No. Same Defendant New Defendant Magistrate Judge Case Number Search Warrant Case Number R 20/R 40 from District of
Defendant Information:	
Defendant Name EDWIN TORREZ	Juvenile Yes X No
Alias Name	
Address 219 BLACK BROOK RD., LO	WELL, MA
Birth date (Year only): 1965 SSN (last	1 #): Sex Race: Nationality:
Defense Counsel if known:	Address:
Bar Number:	·
U.S. Attorney Information:	
AUSA DENISE JEFFERSON CASPER	Bar Number if applicable
Interpreter: X Yes No	List language and/or dialect: SPANISH
Matter to be SEALED: X Yes	No No
X Warrant Requested	Regular Process In Custody
Location Status:	
Arrest Date:	· · · · · · · · · · · · · · · · · · ·
Already in State Custody	in Serving Sentence Awaiting Trial on
Charging Document: X Compla	int Information Indictment
Total # of Counts: Petty	Misdemeanor X Felony 1
Contin	ue on Page 2 for Entry of U.S.C. Citations
I hereby certify that the case nuraccurately set forth above.	mbers of any prior proceedings before a Magistrate Judge are
Date: OCTOBER 14, 2004 S	ignature of AUSA:

		O MA 3/25/02) Page 2				
		•	lled in by deputy cl	erk):		· · · · · · · · · · · · · · · · · · ·
TVAILE U		-	U.S.C.	Citations		
	Index Ke	<u>y/Code</u>	<u>Descripti</u>	on of Offense Charg	<u>ed</u>	Count Numbers
Set 1	21 USC § 846		Conspiracy to dis	tribute heroin		
Set 2						
Set 3						
Set 4					<u></u>	
Set 5						
Set 6						
Set 7	····					
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Set 11 _						
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Set 14 _		··· ·······				
Set 15		· 				

Criminal Case Cover Sheet	<u>U.S</u>	. District Court - District of Massachusetts
Place of Offense: C	ategory No. I	Investigating Agency DEA
City	Related Case Information:	/
County MIDDLESEX/WORCESTER		Case No. New Defendant (10)
Defendant Information:		
Defendant Name ZULEIMA REYES		Juvenile Yes X No
Alias Name LINDA		
Address 10 CONLON TERRACE, LOW	ELL, MA	· · · · · · · · · · · · · · · · · · ·
Birth date (Year only): 1979 SSN (last 4	1#): Sex Race:	Nationality:
Defense Counsel if known:	Ad	dress:
Bar Number:		
U.S. Attorney Information:		
AUSA DENISE JEFFERSON CASPER	Bar Numb	er if applicable
Interpreter: X Yes No	List language and/or	dialect: SPANISH
Matter to be SEALED: X Yes	□ No	
Warrant Requested	Regular Process	☐ In Custody
Location Status:		
Arrest Date:		
Already in Federal Custody as		in
Already in State Custody On Pretrial Release: Ordered by		
Charging Document: X Compla	int Information	Indictment
Total # of Counts: Petty	Misdemean	or X Felony 1
Contin	ue on Page 2 for Entry of U.S	.C. Citations
I hereby certify that the case nuraccurately set forth above.	mbers of any prior proceeding	gs before a Magistrate Judge are
Date: OCTOBER 14, 2004 S	ignature of AUSA	misi (). appn

S JS 45	(5/97) - (Revised USA	O MA 3/25/02) Page	2 of 2 or Reverse	
Distri	ct Court Case N	umber (To be f	filled in by deputy clerk):	
Name	of Defendant	ZULEIMA RI	EYES	
			U.S.C. Citations	
	Index Ke	y/Code	Description of Offense Charged	Count Numbers
Set 1	21 USC § 846		Conspiracy to distribute heroin	
Set 2				
Set 3				
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Set 14				_
Set 15				

Criminal Case Cover Sheet	<u>U.S</u>	6. District Court - District of Massachusetts
Place of Offense:	Category No	Investigating Agency DEA
City	Related Case Information:	
County MIDDLESEX/WORCESTER	Search Warrant Case Number	Case No. DYMJ600 New Defendant CII
Defendant Information:		
Defendant Name SANTIAGO ARROY	0	Juvenile Yes X No
Alias Name		
Address 4 MURRAY COURT, APT 61	, NASHUA, NEW HAMPSHIRE	Ξ
Birth date (Year only): 1983 SSN (last	4 #): Sex Race:	Nationality:
Defense Counsel if known:	Ad	dress:
Bar Number:		
U.S. Attorney Information:		
AUSA DENISE JEFFERSON CASPER	Bar Numb	er if applicable
Interpreter: X Yes No	List language and/or	dialect: SPANISH
Matter to be SEALED: X Yes	No No	
XWarrant Requested	Regular Process	☐ In Custody
Location Status:		
Arrest Date:		
Already in Federal Custody as		in
Already in State Custody		Sentence Awaiting Trial
On Pretrial Release: Ordered by		on
Charging Document: X Comp	laint Information	Indictment
Total # of Counts: Petty	Misdemean	or X Felony 1
Conti	nue on Page 2 for Entry of U.S.	.C. Citations
I hereby certify that the case n accurately set forth above.	umbers of any prior proceeding	gs before a Magistrate Judge are
Date: OCTOBER 14, 2004	Signature of AUSA:	

ibilite Court Case I	umber (10	be filled in by deputy clerk):	
ame of Defendant	SANTIAC	GO ARROYO	
		U.S.C. Citations	
Index Ke	y/Code	Description of Offense Charged	Count Numbers
et 1 <u>21 USC § 846</u>		Conspiracy to distribute heroin	
et 2			
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